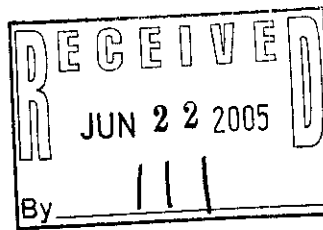




**BENCHMARK  
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**Kenbridge Office**

P O Box 569 • 100 S Broad Street  
Kenbridge, Virginia 23944

Phone (434) 676-8444  
FAX (434) 676-1875  
www.BCBonline.com

June 17, 2005

Robert E Feldman  
Attention: Comments  
Federal Deposits Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Dear Mr. Feldman

I would like to express my opposition to the **Proposed Classification of Commercial Credit Exposures.**

The current FAS 114 review already requires that we calculate loss severity for loans rated below the "Pass" category. Our bank currently utilizes six classifications, Pass, Pass – Acceptable with Care, Special Mention, Substandard, Doubtful, and Loss, in our quarterly review of commercial borrowers. Any relationship graded below "Pass" is subjected to a detailed review whereby a specific reserve is established based on that relationship's projected loss amount.

The current system is effective and already accomplishes what this new method proposes. A change will only introduce more confusion and cost into the process with no measurable benefit to the safety and soundness of the bank.

Sincerely,

Debra O. Brandon  
Vice-President/Branch Manager